

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	
	§	
SOUTHERN FOODS GROUP, LLC <i>et al</i>	§	Case No. 19-36313
	§	Chapter 11
Debtor(s). ¹	§	
	§	

NOTICE OF APPEARANCE AND REQUEST FOR NOTICES AND SERVICE

PLEASE TAKE NOTICE that Elizabeth A. Gilman and the firm of K&L Gates LLP are making their appearance on behalf of Land O’Lakes, Inc. (“Land O’Lakes”) a creditor and party in interest in this proceeding, and, in accordance with Rules 2002, 3017(a) and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Sections 342 and 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532, (the “Bankruptcy Code”), request

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective Employer Identification Numbers, are as follows: Southern Foods Group, LLC (1364); Dean Foods Company (9681); Alta-Dena Certified Dairy, LLC (1347); Berkeley Farms, LLC (8965); Cascade Equity Realty, LLC (3940); Country Fresh, LLC (6303); Dairy Information Systems Holdings, LLC (9144); Dairy Information Systems, LLC (0009); Dean Dairy Holdings, LLC (9188); Dean East II, LLC (9192); Dean East, LLC (8751); Dean Foods North Central, LLC (7858); Dean Foods of Wisconsin, LLC (2504); Dean Holding Company (8390); Dean Intellectual Property Services II, Inc. (3512); Dean International Holding Company (9785); Dean Management, LLC (7782); Dean Puerto Rico Holdings, LLC (6832); Dean Services, LLC (2168); Dean Transportation, Inc. (8896); Dean West II, LLC (9190); Dean West, LLC (8753); DFC Aviation Services, LLC (1600); DFC Energy Partners, LLC (3889); DFC Ventures, LLC (4213); DGI Ventures, Inc. (6766); DIPS Limited Partner II (7167); Franklin Holdings, Inc. (8114); Fresh Dairy Delivery, LLC (2314); Friendly’s Ice Cream Holdings Corp. (7609); Friendly’s Manufacturing and Retail, LLC (9828); Garelick Farms, LLC (3221); Mayfield Dairy Farms, LLC (3008); Midwest Ice Cream Company, LLC (0130); Model Dairy, LLC (7981); Reiter Dairy, LLC (3675); Sampson Ventures, LLC (7714); Shenandoah’s Pride, LLC (2858); Steve’s Ice Cream, LLC (6807); Suiza Dairy Group, LLC (2039); Tuscan/Lehigh Dairies, Inc. (6774); Uncle Matt’s Organic, Inc. (0079); and Verifine Dairy Products of Sheboygan, LLC (7200). The debtors’ mailing address is 2711 North Haskell Avenue, Suite 3400, Dallas, Texas 75204.

that copies of all notices, pleadings, orders, and other papers in this case be served on the following person at the following address:

Elizabeth A. Gilman
K&L Gates LLP
1000 Main Street, Suite 2550
Houston, Texas 77002
Phone: (713) 815-7300
Facsimile: (713) 815-7301
Email: beth.gilman@klgates.com

Brandy A. Sargent
K&L Gates LLP
1 SW Columbia St., Suite 1900
Portland, OR 97258
Phone: (503) 226.5735
Facsimile: (503)248.9085
Email: brandy.sargent@klgates.com

With copies to:

James A. Wright III
K&L Gates LLP
One Lincoln Street
Boston, MA 02111
Phone: (617) 261-3193
Facsimile: (617) 261-3175
Email: james.wright@klgates.com

PLEASE TAKE FURTHER NOTICE that this request includes not only the notices and papers referred to in the rules of the Bankruptcy Rules and sections of the Bankruptcy Code specified above, but also includes, without limitation, any and all orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, electronic mail, courier service, hand-delivery, telephone, facsimile transmission, or otherwise pertaining in any manner to the above-referenced cases or the proceedings therein.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for Notices and Service shall not be deemed or construed to be a waiver of the rights of the undersigned party appearing through counsel: (1) to have final orders in non-core matters and *Stern* claims entered only after *de novo* review by a United States District Court Judge; (2) to trial by jury in any proceeding so triable in these cases, controversies, or proceeding related to these cases; (3) to

have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (4) to have its claims or other rights adjudicated pursuant to any rights of arbitration; or (5) to any other rights, claims, actions, setoffs, or recoupments to which it is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions defenses, setoffs, and recoupments are hereby expressly reserved. All of the above rights are expressly reserved and preserved unto Land O'Lakes without exception, and with no purpose of confessing or conceding jurisdiction in any way by this filing or by any other participation in these matters.

Dated: November 18, 2019.

Respectfully submitted,

K&L Gates LLP

By: /s/ Elizabeth A. Gilman

Elizabeth A. Gilman

Texas Bar No. 24069265

Federal ID No. 1120022

beth.gilman@klgates.com

1000 Main, Suite 2550

Houston, Texas 77002

Telephone: (713) 815-7300

Facsimile: (713) 815-7301

Brandy A. Sargent (*pro hac vice* forthcoming)

Oregon Bar No. 045713

brandy.sargent@klgates.com

1 SW Columbia Street, Suite 1900

Portland Oregon 97204

Telephone: (503) 226-5735

James A. Wright III (*pro hac vice* forthcoming)

BBO No. 671822

james.wright@klgates.com

State Street Financial Center

One Lincoln Street

Boston, Massachusetts 02111

Telephone: (617) 261-3100

ATTORNEYS FOR LAND O'LAKES, INC.

CERTIFICATE OF SERVICE

I hereby certify that on November 18, 2019, a copy of the foregoing was sent via ECF to all parties registered to receive electronic notice in the case.

/s/ Elizabeth A. Gilman
Elizabeth A. Gilman